UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA ex rel. DONALD GALE,	)	
Plaintiffs and Relator,	)	Case No. 1:10-CV-0127
v.	)	Judge James Gwin
OMNICARE, INC.,	)	Magistrate Judge Kenneth McHargh
Defendant.	)	

DECLARATION OF PETER ARONOFF

PETER ARONOFF, an attorney duly admitted to practice law in the State of New York, states as follows, pursuant to 28 U.S.C. § 1746:

1. My law firm Sanford Heisler LLP, together with the firms Morgan Verkamp LLC, Berger & Montague, P.C., and Calfee, Halter & Griswold LLP, represent Relator Donald Gale in this action.
2. I am over the age of eighteen and am under no legal disability that would prevent me from testifying in regard to the matters contained within this Declaration.
3. Exhibit A is a true and accurate copy of an email sent by Rolf Schrader, produced by Omnicare as OMNIe00000147.
4. Exhibit B is a true and accurate copy of a legal memorandum produced by Omnicare as OMNie00027351.
5. Exhibit C is a true and accurate copy of OIG Advisory Opinion No. 99-13, available online at http://oig.hhs.gov/fraud/docs/advisoryopinions/1999/ao99_13.htm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 21st day of August, 2013, in New York, New York.

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